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7 REY MOBILE HOME ESTATES  
8

9 UNITED STATES BANKRUPTCY COURT

10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

11 In re  
12 JAMIE LYNN GALLIAN,  
13 Debtor.

Case No. 8:21-bk-11710-SC

Chapter 7

SIGNATURE OF CHRIS HOUSER TO  
DECLARATION IN SUPPORT OF NOTICE  
OF MOTION AND MOTION OBJECTING TO  
DEBTOR'S CLAIMED HOMESTEAD  
EXEMPTION IN "PAD" LOCATED AT 16222  
MONTEREY LN., SPACE 376, HUNTINGTON  
BEACH, CA 92649 – DK. NO. 529

Date: February 4, 2025

Time: 11:00 a.m.

Ctrm: 5C<sup>1</sup>

Location: 411 W. Fourth Street, Santa Ana, CA  
92701

28 <sup>1</sup> Check Judge Clarkson's tentative rulings prior to the hearing for Zoom connection information and  
instructions. <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC>

## **Declaration of Chris Houser**

I, CHRIS HOUSER, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.

3. The facts set forth below are true of my personal knowledge.

4. I am the Park Operations Manager for Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates (“Houser Bros.”).

9       5.     I make this Declaration in support of Houser Bros.'s Motion ("Motion") Objecting to  
10 Debtor's Claimed Exemption in 16222 Monterey Ln., Space 376, Huntington Beach, CA  
11 92649 "Pad" ("Pad"). All capitalized terms not otherwise defined in this Declaration shall have the  
12 meaning ascribed to them in the Motion.

13       6.     Houser Bros. owns the mobilehome park where the Pad is located. Houser Bros.'s  
14 business model is to lease space (pads) to residents of the mobilehome park, who generally own their  
15 respective mobilehomes.

16           7.       Houser Bros. has never approved the Debtor or any of her business entities (including  
17 J-Sandcastle Co. LLC and J-Pad LLC) for occupancy at the mobilehome park.

18       8.      Houser Bros. has never accepted rent from the Debtor nor any of her business entities  
19 (including J-Sandcastle Co. LLC and J-Pad LLC) for the Pad.

20 9. The Debtor continues to occupy the Pad without Houser Bros.'s consent or approval.

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10. A true and correct copy of the Property Detail report regarding the Pad, including the grant deed, is attached as **Exhibit 2**.

11. On December 12, 2024, the State Court granted Houser Bros. summary judgment in its forcible entry/detainer action against the Debtor based on her moving onto the premises without a lease agreement for the land upon which the manufactured home is located. In ruling for Houser Bros., the State Court found that Houser Bros. was the owner of the land. A true and correct copy of the State Court's ruling is attached as **Exhibit 3**.

8       12. On December 13, 2024, the Debtor sent an e-mail to my attorney, Vivienne Alston,  
9 with copy to the Trustee and his counsel advising that she was going to remove the manufactured  
10 home from Houser Bros.'s property. A true and correct copy of this e-mail is attached as **Exhibit 4**.

11 I declare under penalty of perjury that the foregoing is true and correct. Executed on January  
12 2, 2025. 

[Signature to Be Provided]

CHRIS HOUSER

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **SIGNATURE OF CHRIS Houser TO DECLARATION IN SUPPORT OF NOTICE OF MOTION AND MOTION OBJECTING TO DEBTOR'S CLAIMED HOMESTEAD EXEMPTION IN "PAD" LOCATED AT 16222 MONTEREY LN., SPACE 376, HUNTINGTON BEACH, CA 92649 – DK. NO. 529** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On January 10, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On January 10, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN UNIT 376  
HUNTINGTON BEACH, CA 92649

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on January 10, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY:**

**PRESIDING JUDGE'S COPY**  
HONORABLE SCOTT C. CLARKSON  
UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
411 WEST FOURTH STREET, SUITE 5130 /  
COURTROOM 5C  
SANTA ANA, CA 92701-4593

**VIA EMAIL:**

**DEBTOR**  
JAMIE LYNN GALLIAN  
jamiegallian@gmail.com

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 10, 2025 Layla Buchanan  
Date Printed Name

/s/ Layla Buchanan  
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** Bradford Barnhardt bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** Aaron E DE Leest adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF THE HUNTINGTON BEACH GABLES HOMEOWNERS' ASSOCIATION:** Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **CHAPTER 7 TRUSTEE JEFFREY I GOLDEN (TR):** Jeffrey I Golden (TR) lwerner@wglp.com, jig@trustesolutions.net; kadele@wglp.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF THE HUNTINGTON BEACH GABLES HOMEOWNERS' ASSOCIATION:** Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- **ATTORNEY FOR TRUSTEE JEFFREY I GOLDEN (TR):** Eric P Israel eisrael@DanningGill.com, danninggill@gmail.com; eisrael@ecf.inforuptcy.com
- **INTERSTED PARTY COURTESY NEF: Shantal Malmed** shantal.malmed@gmlaw.com, cheryl.caldwell@gmlaw.com
- **INTERESTED PARTY COURTESY NEF: Shantal Malmed** , cheryl.caldwell@gmlaw.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** Laila Masud lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR DEFENDANT RANDALL L NICKEL:** Mark A Mellor mail@mellorlawfirm.com, mellormr79158@notify.bestcase.com
- **INTERESTED PARTY COURTESY NEF:** Valerie Smith claims@recoverycorp.com
- **U.S. TRUSTEE:** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

4903-7392-5900, v. 1